

# Managing Excess Vaccines

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## How Should I Manage Excess Vaccines?

Depending on vaccine ingredients, discarded vaccines may be infectious waste, hazardous waste, or non-hazardous solid waste (regular trash).

### ***Vaccines that may be infectious waste when discarded***

The following vaccines that contain live attenuated virus are infectious waste when discarded, according to Gwen Borlaug of the Wisconsin Division of Public Health:

- Influenza – only FluMist®
- Measles, Mumps and Rubella (MMR) – All
- Varicella (chickenpox) – All

Here are your options for managing excess live virus vaccine:

- Contact the manufacturer (MedImmune for FluMist® and Merck for all others) to see if it can be returned for proper management. For excess live virus vaccine that is not returned to the manufacturer, see the following options.
- Send it to an infectious waste treatment facility for disinfection and subsequent management as regular trash. (Lists of infectious waste

transporters are available at [dnr.wi.gov/org/aw/wm/faclists](http://dnr.wi.gov/org/aw/wm/faclists)); or

- Disinfect it yourself according to ss. NR 526.11 and 526.12, Wis. Adm. Code, ([www.legis.state.wi.us/rsb/code/nr/nr526.pdf](http://www.legis.state.wi.us/rsb/code/nr/nr526.pdf)). Be sure to keep records. Manage the disinfected vaccine as regular trash.

### ***Vaccines that may be hazardous waste when discarded***

Some flu vaccines (not FluMist®), and some tetanus and meningococcal vaccines, are preserved with 1:10,000 or 0.01 % Thimerosal (see [www.vaccinesafety.edu/thi-table.htm](http://www.vaccinesafety.edu/thi-table.htm)). Thimerosal contains about 50 % mercury by weight. Vaccines with 1:10,000 or 0.01 % Thimerosal have about 50 mg/L mercury, which exceeds the 0.2 mg/L hazardous waste toxicity characteristic regulatory level for mercury. Discarded Thimerosal-preserved vaccines may need to be managed as D009 hazardous waste, according to state and federal hazardous waste management requirements.

NOTE: One mercury-containing fever thermometer contains the same amount of mercury (1/2 gram) as 20,000 adult doses of Thimerosal-preserved vaccine. While bulk mercury (e.g., in a mercury fever thermometer) is a bigger threat to human health and the environment compared to a Thimerosal-preserved vaccine, it is still important to manage these discarded vaccines properly.

It is illegal to manage Thimerosal-preserved vaccines as infectious waste or regular trash.

Here are your options for managing excess Thimerosal-preserved vaccines:

- Ship *unexpired* vaccines to the manufacturer for use or proper management (with prior permission from the manufacturer),
- Manage the vaccines under the State of

Wisconsin hazardous waste management contract,

- Transport the vaccines to a Wisconsin very small quantity generator (VSQG) hazardous waste collection facility, or
- Contract directly with a hazardous waste management company to manage the vaccines.

There is detailed information on these options below. Please review the information carefully as all of the options have conditions, and one option may be **required** for certain generators.

### ***Vaccines that are non-hazardous solid waste when discarded***

Except for live virus vaccines and Thimerosal-preserved vaccines, all other vaccines should be non-hazardous solid waste when discarded. (See the above list of live virus vaccines. See the list at [www.vaccinesafety.edu/thi-table.htm](http://www.vaccinesafety.edu/thi-table.htm) for Thimerosal-preserved vaccines.) You may manage these other discarded vaccines with your regular trash.

## Options for Managing Excess Thimerosal-Preserved Vaccines

Please read these options carefully, as they all have conditions and one option may be **required** for certain generators.

### ***OPTION 1. Ship Unexpired Vaccines to the Manufacturer for Use or Proper Management (with prior permission from the manufacturer)***

Vaccines managed under this option are not regulated in Wisconsin as solid or hazardous waste. To use this option, the vaccines MUST NOT have expired. (*Expired* Thimerosal-preserved vaccines are regulated as hazardous waste and should be managed under options 2 to 4.)

Contact the manufacturer to see if this option is available for your *unexpired* vaccine and under what conditions. We strongly recommend you check into how the manufacturer will manage the returned vaccines to minimize your organization's liability for any environmental contamination caused by managing the vaccines. Shipments should comply

with any applicable US Department of Transportation (US DOT) Hazardous Materials Regulations. For information on those regulations, go to [hazmat.dot.gov](http://hazmat.dot.gov) or call (608) 829-7530 (Madison) or (800) 467-4922.

### ***OPTION 2. Manage the Vaccines under the State of Wisconsin Hazardous Waste Management Contract***

#### General

All State of Wisconsin agencies, institutions and campuses (e.g., UW-Madison and UW System) that do not use option 1 are **required** to use the State contract. Additionally, Wisconsin municipalities **may** use the State contract.

NOTE: "Municipality" is broadly defined at [vendornet.state.wi.us/vendornet/procman/prod30.asp](http://vendornet.state.wi.us/vendornet/procman/prod30.asp)

Information on the State contract is available at [vendornet.state.wi.us/vendornet/asp/ContractDetail.asp?SystemContractNumber=1823](http://vendornet.state.wi.us/vendornet/asp/ContractDetail.asp?SystemContractNumber=1823)

#### Transportation Requirements

If you use the State contract and you are a Wisconsin very small quantity generator (VSQG) of hazardous waste, you may self-transport your hazardous waste, without a hazardous waste transportation license, to the contractor.

NOTE: VSQG is defined in Guidance (see p. 2 of [www3.uwm.edu/Dept/shwec/publications/cabinet/pdf/720bb9612.pdf](http://www3.uwm.edu/Dept/shwec/publications/cabinet/pdf/720bb9612.pdf)) and in Rule (NR 610.07(1)(intro.) and 610.09(1), Wis. Adm. Code at [www.legis.state.wi.us/rsb/code/nr/nr610.pdf](http://www.legis.state.wi.us/rsb/code/nr/nr610.pdf)).

Before considering self-transport, you should get permission from your agency's, institution's or campus' risk management and fleet programs. You should also comply with the following conditions from the May 1995 Wisconsin DNR Interim Guidance for Household and VSQG Hazardous Waste Collection Facilities:

- a. Obtain a receipt from the contractor that includes:
  - i. Your entity's name and generation address, including county,
  - ii. Type of hazardous waste received, hazardous waste code, quantity and units of measure,
  - iii. Date of receipt, and
  - iv. A signed and dated certification statement

that reads:

"I, (insert the very small quantity generator's name), certify that I am currently knowledgeable of the hazardous waste regulations as they pertain to my business and certify that the hazardous waste listed was generated by a very small quantity generator of hazardous waste. I further certify that a copy of this receipt shall be kept in the business files at the place of hazardous waste generation for regulatory review for a minimum of three years from this date.", and

- b. Maintain hazardous waste receipts received from the contractor for three years from the date of receipt.

Transporters should also comply with any applicable US DOT Hazardous Materials Regulations. For information on those regulations, go to [hazmat.dot.gov](http://hazmat.dot.gov) or call (608) 829-7530 (Madison) or (800) 467-4922. While the regulations don't apply to shipments of hazardous materials transported by a government entity in vehicles operated by government personnel for noncommercial purposes, we recommend following the regulations as good management practices.

### **OPTION 3. Transport the Vaccines to a Wisconsin Very Small Quantity Generator (VSQG) Hazardous Waste Collection Facility**

If you are not required to use option 2, you may use this option if:

- a. You are a Wisconsin VSQG (see option 2, 2nd Note), and
- b. You ship your hazardous waste vaccines to a Wisconsin VSQG collection facility.

NOTE: Contact a VSQG collection facility near you for information on acceptance of hazardous waste and costs for managing it. A list of Wisconsin VSQG collection facilities is available at [www.uwex.edu/erc/pdf/HHW/VSQGAddress.pdf](http://www.uwex.edu/erc/pdf/HHW/VSQGAddress.pdf)

If you self-transport your hazardous waste vaccines, without a hazardous waste transportation license, to a Wisconsin VSQG collection facility, you should comply with the transportation requirements in option 2.

### **OPTION 4. Contract Directly with a Hazardous Waste Management Company to Manage the Vaccines**

You may use this option if you are not required to use option 2.

NOTE: A fact sheet titled "Off-site Disposal of Hazardous Wastes: Choosing the Right Treatment, Disposal Facility, and Hazardous Waste Hauler" is available at [www.uwex.edu/ces/ag/sus/sbdc/pdf/tocdt/AB2\\_4.pdf](http://www.uwex.edu/ces/ag/sus/sbdc/pdf/tocdt/AB2_4.pdf)

Lists of licensed Wisconsin hazardous waste transporters are available at [dnr.wi.gov/org/aw/wm/facilists](http://dnr.wi.gov/org/aw/wm/facilists)

If you are a Wisconsin VSQG and you self-transport your hazardous waste vaccines, without a hazardous waste transportation license, to a licensed or approved Wisconsin hazardous waste management facility, you should comply with the transportation requirements in option 2.

## More Information on Hazardous Waste Management Requirements

See Wisconsin's hazardous waste guidance at [dnr.wi.gov/org/aw/wm/publications](http://dnr.wi.gov/org/aw/wm/publications)

See Wisconsin's hazardous waste management rules at [www.legis.state.wi.us/rsb/code/nr/nr600.html](http://www.legis.state.wi.us/rsb/code/nr/nr600.html)

Contact the "Other Hazardous Waste Requirements" contact person for the county you are located in, per [dnr.wi.gov/org/aw/wm/contacts/hazard.htm](http://dnr.wi.gov/org/aw/wm/contacts/hazard.htm), or call (608) 266-2111.

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